

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
Meeting	09/01/13	DRK	Meeting with potential clients; discussion of future actions, discovery needed, key witnesses and documents, and future actions	4.5	\$400.00	\$1,800.00
	09/15/13	DRK	Review of JB research and meeting with JB re outlining complaint	1.3	\$400.00	\$520.00
	03/18/14	JB	Meeting with Paul Willoughby regarding responses to discovery requests	1.5	\$250.00	\$375.00
	03/25/14	JB	Meeting with Phillip Davis regarding discovery responses	0.7	\$250.00	\$175.00
	03/25/14	JB	Meeting with Paul Willoughby regarding discovery responses	1.5	\$250.00	\$375.00
	04/09/14	JB	Meeting with Crystal Foster-Gadsden re consent to withdraw documents	0.2	\$250.00	\$50.00
	04/09/14	JB	Phone call to clients to schedule deposition prep meetings	0.2	\$250.00	\$50.00
	04/18/14	JB	Meeting with Phillip Davis regarding deposition	1.5	\$250.00	\$375.00
	04/18/14	JB	Meeting with Jamie Stephenson regarding deposition of current Youth Villages employees	1.5	\$250.00	\$375.00
	04/19/14	DRK	Meeting with Jamie Stephenson re deposition preparation, future actions	3.0	\$400.00	\$1,200.00
	04/21/14	JB	Prepare for meeting with Paul Willoughby regarding deposition preparation	0.1	\$250.00	\$25.00
	04/21/14	JB	Meeting with Paul Willoughby to prepare for clients deposition	2.1	\$250.00	\$525.00
	05/20/14	JB	Meeting with ZK regarding case and to discuss creating a chart of the FWW violations and damages estimations	1.0	\$250.00	\$250.00
	05/20/14	JB	Prepare for prospective client meetings	0.8	\$250.00	\$200.00
	05/21/14	JB	Meeting with J. Simms regarding consent to join the lawsuit; phone calls to various prospective plaintiffs; review and analyze defendants settlement offer correspondence	1.8	\$250.00	\$450.00
	05/21/14	JB	Meeting with Amber Davis regarding joining the lawsuit	0.2	\$250.00	\$50.00
	05/21/14	JB	Meeting with Fannie Cham regarding joining the lawsuit	0.2	\$250.00	\$50.00
	05/21/14	JB	Prepare for prospective client meeting with Markus Brown; meeting with Markus Brown	0.5	\$250.00	\$125.00
	05/28/14	JB	Phone call with Phillip Davis regarding meeting	0.1	\$250.00	\$25.00
	05/30/14	JB	Prepare for meeting with Phillip Davis (0.5); meeting with Phillip Davis to discuss settlement offer (0.4)	0.9	\$250.00	\$225.00
	10/20/14	JB	Conduct office meeting regarding conditional certification process	1.0	\$250.00	\$250.00
	12/02/14	DRK	Meeting with JB	0.3	\$400.00	\$120.00
	01/06/15	JB	Prepare to schedule client meetings regarding discovery responses and confirm client availability for depositions	2.0	\$250.00	\$500.00
	01/07/15	JB	Phone call with B. Artumus regarding discovery responses meeting	0.2	\$250.00	\$50.00
	01/12/15	JB	Travel to Douglasville for client meetings and depositions (0.8); prepare two clients for depositions, review client time and payroll records to prepare for multiple client discovery response meetings, meet with six clients to complete discovery responses (8);	8.8	\$250.00	\$2,200.00
	01/12/15	DRK	Travel to Douglasville, meeting with multiple clients re preparation for deposition; review of key documents and payroll items with clients; defending of depositions	9.1	\$400.00	\$3,640.00
	01/13/15	JB	Client meeting with T. Floyd to prepare for deposition and confer with opposing counsel regarding deposition	1.0	\$250.00	\$250.00

EXHIBIT

B

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	01/13/15	JB	Client meeting with S. Liner regarding discovery responses and deposition preparation and defendant clients deposition	1.0	\$250.00	\$250.00
	01/13/15	JB	Client meeting with B. Creekmore regarding discovery responses	1.0	\$250.00	\$250.00
	01/13/15	JB	Prepare for and meeting with three clients regarding preparation of discovery responses	1.8	\$250.00	\$450.00
	01/13/15	JB	Multiple client meetings with J. Lockette, T. Armstead, and L. Hayes regarding offer of judgment and discovery responses	3.5	\$250.00	\$875.00
	01/13/15	DRK	Meeting with clients re defending depositions	0.8	\$400.00	\$320.00
	01/15/15	DRK	Meeting with clients/witnesses in Douglasville	3.8	\$400.00	\$1,520.00
	02/05/15	JB	Meeting with D. Hazelwood	0.5	\$250.00	\$125.00
	03/25/15	DRK	meeting with JB re review and edit of discovery responses	0.3	\$400.00	\$120.00
	07/23/15	JB	Office meeting with TC regarding response to motion to dismiss	0.3	\$250.00	\$75.00
	12/03/15	TC	Meeting with DRK re response to MTD and filing of Rule 56(d) motion	0.5	\$200.00	\$100.00
	02/02/16	DRK	Meeting with clients and JB in prep for mediation	1.0	\$400.00	\$400.00
	03/02/16	JB	Meeting with B. Artumus regarding settlement documents and amount	0.1	\$295.00	\$29.50
	04/14/16	DRK	Meeting with various clients re check distribution, discussion with Mr. Artamus re his confusion about settlement amounts and future actions.	0.8	\$400.00	\$320.00
TOTAL HOURS/AMOUNT				61.4		\$19,064.50
Legal Research FWW	09/05/13	JB	Legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	3.0	\$250.00	\$750.00
	09/06/13	JB	Continue legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	4.0	\$250.00	\$1,000.00
	09/09/13	JB	Continue legal research on the fww and whether failure to properly calculate the regular rate prevents there from being a clear mutual understanding	2.0	\$250.00	\$500.00
	09/11/13	JB	Finalize legal research on FWW and prepare a memo summarizing the same	1.0	\$250.00	\$250.00
	04/09/14	JB	Legal research on fluctuating workweek prerequisites in order to prepare for depositions	3.7	\$250.00	\$925.00
	10/07/14	JB	Research recent Judge Story opinion on fluctuating workweek damages (.5); legal research on recent decisions nationally relating to fluctuating workweek (.5); review Judge Jones docket for FWW cases (.2)	1.2	\$250.00	\$300.00
	02/15/15	JB	legal research on research FWW settlement consent order	0.3	\$250.00	\$75.00
	03/13/15	JB	Legal research on requirement for hours to fluctuate (1.0); legal research on recent FWW opinions (.8)	1.8	\$250.00	\$450.00
TOTAL HOURS/AMOUNT				17.0		\$4,250.00
Drafting	09/16/13	JB	Begin drafting complaint	0.5	\$250.00	\$125.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	9/18/2013	JB	Continue drafting complaint (.3); confer with DRK regarding strategy for drafting complaint (.3); draft additional questions to clients to use in drafting the complaint (.4)	1.0	\$250.00	\$250.00
	09/23/13	JB	Review and analyze recent Northern District of Illinois opinion relating to fww and draft a summary of the same	0.8	\$250.00	\$200.00
	09/25/13	DRK	Edit of first draft of complaint and return to JB with comments (1.0)	1.0	\$400.00	\$400.00
	09/27/13	JB	Draft follow-up correspondence to clients regarding completion of questionnaire	0.1	\$250.00	\$25.00
	09/30/13	JB	Continue to draft complaint (0.5)	0.5	\$250.00	\$125.00
	10/23/13	JB	Review and analyze Lamonica v. Safe Hurricane Shutters, Inc. a 2013 11th Circuit opinion to determine whether it affects our case and draft a summary of the same	0.5	\$250.00	\$125.00
	01/17/14	JB	Draft correspondence to opposing counsel regarding scheduling Rule 26(f) conference (.4)	0.4	\$250.00	\$100.00
	01/24/14	JB	Begin drafting Plaintiffs first requests for production of documents	0.5	\$250.00	\$125.00
	01/28/14	JB	Draft and respond to multiple correspondence to opposing counsel regarding 26(f) conference and JPR (.2)	0.2	\$250.00	\$50.00
	02/04/14	JB	Review and analyze Defendants revisions to the JPR, confer with DRK regarding the same, and begin to prepare a revised draft of the JPR	1.0	\$250.00	\$250.00
	02/04/14	JB	Continue drafting Plaintiffs first requests for production of documents	1.0	\$250.00	\$250.00
	02/04/14	JB	Legal research on the legal standard for a motion for certification of a collective action and begin drafting the same	2.0	\$250.00	\$500.00
	02/10/14	JB	Continue to draft and revise 30(b)(6) deposition topics	0.5	\$250.00	\$125.00
	02/10/14	JB	Continue to draft and revise first requests for production of documents	0.3	\$250.00	\$75.00
	02/11/14	JB	Draft correspondence to opposing counsel regarding scheduling depositions (.1); draft correspondence to DRK regarding finalizing initial disclosures and strategy for depositions (.1); draft correspondence to Mr. Davis regarding receipt of declaration (.2)	0.4	\$250.00	\$100.00
	02/13/14	JB	Draft correspondence to opposing counsel regarding deposition scheduling (.5)	0.5	\$250.00	\$125.00
	03/14/14	JB	Begin drafting reply brief in support of motion for conditional certification (2.5)	2.5	\$250.00	\$625.00
	03/24/14	JB	Continue to draft and revise reply in support of motion for conditional certification	2.3	\$250.00	\$575.00
	05/23/14	JB	Prepare supplement in support of motion for conditional certification by reviewing relevant deposition transcripts, drafting said motion and gathering exhibits	4.3	\$250.00	\$1,075.00
	06/30/14	JB	Continue to draft reply in support of motion for leave to file supplemental briefing in support of motion for conditional certification	2.6	\$250.00	\$650.00
	07/01/14	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d)	0.8	\$250.00	\$200.00

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	07/02/14	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d) and attorney declaration in support	2.8	\$250.00	\$700.00
	07/11/14	CM	Draft third-party request for production of documents (cell phone communication records between manager and employee on personal phone) and downloaded N.D. Georgia subpoena form	2.6	\$150.00	\$390.00
	08/07/14	CM	Drafted memo discussing requirements to extend statute of limitations to 3 years via willfulness and ability of employer to assert good faith and avoid liquidated damages	2.8	\$150.00	\$420.00
	08/08/14	CM	Drafted additional portion of memo assessing whether relation back doctrine can be used for opt-in plaintiffs to change tolling date (1.0)	1.0	\$150.00	\$150.00
	12/11/14	JB	Continue drafting discovery deficiency letter including reviewing document production to assess what remained outstanding	1.0	\$250.00	\$250.00
	01/13/15	DS	Drafted and finalized letter to J. Mulroy	0.2	\$85.00	\$17.00
	01/14/15	TO	Draft first ROGS RPD to claimant	0.8	\$115.00	\$92.00
	01/15/15	DRK	Review of Rule 11 notice and research re same and lengthy preparation of draft response (3.5)	3.5	\$400.00	\$1,400.00
	01/20/15	DS	Draft, finalize and email 30(b)(6) of Latonya Pendelton to opposing counsel	0.4	\$85.00	\$34.00
	02/04/15	DS	Per JB's request I drafted and mailed letters to the 27 plaintiffs that we did not receive signed verifications from	2.5	\$85.00	\$212.50
	02/25/15	JB	Continuing preparing response to motion for decertification including drafting, legal research on employers obligations related to automatically deducted breaks and reviewing multiple deposition transcripts (7)	7.7	\$250.00	\$1,925.00
	03/05/15	SC	I drafted and sent letters to all clients (47) in regards to each individuals settlement offer given by youth villages	0.7	\$85.00	\$59.50
	03/12/15	JB	Begin to draft statement of material facts (1);	1.0	\$250.00	\$250.00
	03/12/15	JB	Continue drafting motion for summary judgment (0.5)	0.5	\$250.00	\$125.00
	03/13/15	JB	Continue drafting motion for summary judgment (2.5)	2.5	\$250.00	\$625.00
	03/14/15	DRK	Work on draft motion for summary judgement	8.4	\$400.00	\$3,360.00
	03/16/15	JB	Continue to draft motion for summary judgment	8.2	\$250.00	\$2,050.00
	03/24/15	JB	Continue drafting motion to strike	1.3	\$250.00	\$325.00
	03/31/15	SC	I drafted and mailed letters re settlement agreements to Flood, Gaddy, Cooper, Jackson, and Sykes	0.3	\$85.00	\$25.50
	04/06/15	JB	Continue to draft response to defendants Motion for Summary Judgment	1.3	\$250.00	\$325.00
	04/07/15	DRK	Work on draft response for motion for s.j., SMF response	8.2	\$400.00	\$3,280.00
	04/08/15	JB	Continue drafting response brief to Defendants MSJ (2.4); begin preparing Plaintiffs statement of additional facts (0.5).	2.9	\$250.00	\$725.00
	04/28/15	JB	Continue to draft reply brief in support of motion for summary judgment	6.5	\$250.00	\$1,625.00
	04/29/15	JB	Continue drafting reply brief	3.0	\$250.00	\$750.00
	04/30/15	JB	Continue drafting reply brief	5.5	\$250.00	\$1,375.00
	06/19/15	JB	Continue drafting surreply in opposition to Defendants motion to decertify (4.1)	4.1	\$250.00	\$1,025.00

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	07/22/15	TC	Review of file material in order to draft response to MTD	2.7	\$200.00	\$540.00
	07/25/15	DRK	Review of YV Motion to dismiss on Joinder grounds; research re response, other rulings by Judge; email to Telephone call and JB outlining draft response, sending research for same	6.7	\$400.00	\$2,680.00
	07/28/15	JB	Begin to draft response to motion to dismiss for lack of joinder	2.3	\$250.00	\$575.00
	07/29/15	TC	Draft rule 8 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss (4.7)	4.7	\$200.00	\$940.00
	07/30/15	TC	Continue to draft Rule 8 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss	5.0	\$200.00	\$1,000.00
	07/31/15	JB	Continue to draft joinder portion of the response to motion to dismiss	3.2	\$250.00	\$800.00
	07/31/15	TC	draft rule 11 arguments section in Plaintiffs Brief in Opposition to Defendants Motion to Dismiss (2.7)	2.7	\$200.00	\$540.00
	09/10/15	TC	Draft legal arguments for response to Defendants renewed motion for summary judgment (8.0)	8.0	\$200.00	\$1,600.00
	09/11/15	TC	Continue to draft legal arguments for response to Defendants renewed motion for summary judgment	3.0	\$200.00	\$600.00
	10/08/15	JB	Begin to draft response to motion to clarify including legal research on status of claims/complaints post-severance	1.3	\$250.00	\$325.00
	10/21/15	JB	Continue drafting form complaint to use for individual complaints per Court order	1.1	\$250.00	\$275.00
	10/31/15	JB	Continue to draft individual complaints	1.6	\$250.00	\$400.00
	11/25/15	TC	Draft/create spreadsheet of applicable arguments in each MTD	1.5	\$200.00	\$300.00
	12/04/15	TC	Continue to research applicability of a Rule 56(d) motion in response to defendants motion to dismiss with attached exhibits submitted to the Court (3.0); drafting of Plaintiffs response (4.4)	4.4	\$200.00	\$880.00
	12/05/15	TC	Continue to draft Plaintiff (Artumus) Response to Defendants Motion to Dismiss and Motion for Summary Judgment	6.5	\$200.00	\$1,300.00
	12/06/15	TC	Continue to draft Plaintiffs Response to Defendants Motion to Dismiss and Motion for Summary Judgment (10.2)	10.2	\$200.00	\$2,040.00
	12/07/15	TC	(Artumus) Receipt/review of correspondence from OC re: extension of time for Plaintiffs to file response to defendants motions (.1); draft/file Consent Motion to extend time (.8)	0.8	\$200.00	\$160.00
	12/07/15	TC	(Bice) Draft Plaintiffs response to Defendants Motion to Dismiss FLSA claims and breach of contract claim; research GA and 11th Circuit case law re: statute of limitations for state law breach of contract and preemption of FLSA on contract claim (2.9)	2.9	\$200.00	\$580.00
	12/07/15	TC	(Caudle) Draft/file Consent Motion to extend Response to Def. Mot. For Summary Judgment (.2)	0.2	\$200.00	\$40.00
	12/07/15	TC	(Creekmore) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
	12/07/15	TC	(Drake) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00

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	12/07/15	TC	(Haecker) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
	12/07/15	TC	(Harris) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
	12/07/15	TC	(Reid) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
	12/07/15	TC	(Sawadogo) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
	12/07/15	TC	(Sims) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
	12/07/15	TC	(Starr) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
	12/07/15	TC	(Bice) Draft/file Consent Motion for Extension of Time to Response to Def. Mot. to Dismiss(.2)	0.2	\$200.00	\$40.00
	12/08/15	TC	(Artumus) Receipt of DRK edits to Plaintiffs Response to Defendants Motion to Dismiss; continue to draft/edit same (3.4)	3.4	\$200.00	\$680.00
	12/08/15	TC	Draft/file proposed Order for Extension of Time to Respond to Defendants Motion to Dismiss and Motion for Summary Judgment (.7)	0.7	\$200.00	\$140.00
	12/09/15	TC	Continue to draft Plaintiffs Response to Defendants Motion to Dismiss and Declaration of DRK in support of Rule 56(d) (6.2)	6.2	\$200.00	\$1,240.00
	12/10/15	TC	(Artumus) Draft affidavit of DRK for Rule 56(d) (1.2); add citation to affidavit in motion and continue to edit motion. (1.0)	1.2	\$200.00	\$240.00
	12/10/15	TC	(Bice) draft Plaintiffs Response in Opposition to Defendants MTD (5.1)	5.1	\$200.00	\$1,020.00
	12/11/15	TC	(Caudle) Draft response to motion for partial summary judgment (1.2)	1.2	\$200.00	\$240.00
	12/11/15	TC	(Bice) Continue to draft Plaintiffs 200.00/hr Response in Opposition to Defendants MTD (1.2)	1.2	\$200.00	\$240.00
	12/12/15	TC	(Caudle) Research job offer acknowledgement as valid contract and burden of proof of contract at dismissal stage, continue to draft response to motion for partial summary judgment (9.0); draft DRK declaration for rule 56(d) (1.1)	10.1	\$200.00	\$2,020.00
	12/14/15	TC	(Creekmore) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
	12/14/15	TC	(Drake) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
	12/14/15	TC	(Haecker) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
	12/14/15	TC	(Harris) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
	12/14/15	TC	(Reid) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
	12/14/15	TC	(Sawadogo) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00

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	12/14/15	TC	(Sims) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
	12/14/15	TC	(Starr) Draft/file response to Def. Mot. to Dismiss along with declaration of DRK. (.6)	0.6	\$200.00	\$120.00
	03/28/16	DRK	Receipt and review of joint motion for approval and draft order re same; (.8)	0.8	\$400.00	\$320.00
			TOTAL HOURS/AMOUNT	208.7		\$50,625.50
Prepare Complaint						
	10/22/13	JB	Continue to prepare complaint	1.5	\$250.00	\$375.00
	10/23/13	JB	Continue to prepare complaint (2.0)	2.0	\$250.00	\$500.00
	06/17/15	JB	Prepare complaint for second lawsuit	3.5	\$250.00	\$875.00
			TOTAL HOURS/AMOUNT	7.0		\$1,750.00
Edit Complaint						
	11/20/13	JB	Revise and edit complaint and prepare the same for filing	1.0	\$250.00	\$250.00
	06/23/15	JB	Revise and edit complaint	0.5	\$250.00	\$125.00
	06/24/15	JB	Continue to revise and edit complaint (0.7)	0.7	\$250.00	\$175.00
			TOTAL HOURS/AMOUNT	2.2		\$550.00
Discovery Requests						
	01/30/14	JB	Continue preparing Plaintiffs first discovery requests	2.0	\$250.00	\$500.00
	02/24/14	JB	Review and analyze defendants discovery requests, create a chart regarding the same to organize plaintiffs responses (1.0)	1.0	\$250.00	\$250.00
	03/18/14	JB	Meeting with Paul Willoughby regarding responses to discovery requests (1.5);	1.5	\$250.00	\$375.00
	03/18/14	JB	phone call with Crystal Foster-Gadsden regarding responses to discovery requests (0.5)	0.5	\$250.00	\$125.00
	03/25/14	JB	Continue to prepare responses and objections to defendants discovery requests; confer with DRK regarding discovery responses and reply brief	0.8	\$250.00	\$200.00
	07/01/14	CM	Review of discovery requests/responses	1.3	\$150.00	\$195.00
	01/04/15	JB	JB Review discovery requests served on multiple opt-ins	0.7	\$250.00	\$175.00
	01/08/15	TO	Reviewed discovery requests for uniformity, noted discrepancies	1.7	\$115.00	\$195.50
	01/08/15	JB	Continue to prepare responses to individual discovery requests	1.6	\$250.00	\$400.00
	01/09/15	JB	Continue to prepare responses to individual opt-in discovery requests	2.0	\$250.00	\$500.00
	01/20/15	JB	Continue to prepare responses to individual discovery requests served on the opt-In Plaintiffs	0.8	\$250.00	\$200.00
	01/30/15	JB	Revise and edit responses to discovery requests (2.5); phone call with P. Manning regarding discovery response (.2); phone call with T. Sawadogo regarding discovery responses (.4); begin to prepare responses and objections to Defendants request for production of documents (2.5)	5.6	\$250.00	\$1,400.00

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	02/05/15	JB	Review defendants discovery requests and certificates of service to assess whether Sherry Grant was served (0.4)	0.4	\$250.00	\$100.00
	08/17/15	JB	Review and analyze SDNY decision on assertion of good faith defense waiving attorney-client privilege to prepare discovery requests (0.3)	0.3	\$250.00	\$75.00
TOTAL HOURS/AMOUNT				20.2		\$4,690.50
Interrogatories	02/10/14	JB	Prepare Plaintiffs first interrogatories to Defendant	1.0	\$250.00	\$250.00
	03/14/14	JB	Continue to prepare responses and objections to defendants discovery interrogatories, requests for production of documents and request for admission to three plaintiffs	3.5	\$250.00	\$875.00
	04/08/14	JB	Review and analyze Defendants responses to plaintiffs interrogatories and requests for production of documents and prepare charts summarizing the same	2.0	\$250.00	\$500.00
	10/15/14	JB	Finalize discovery deficiency letter to opposing counsel and prepare second interrogatories (0.3)	0.3	\$250.00	\$75.00
	01/31/15	JB	Continue to prepare responses and objections to Defendants requests for production of documents and interrogatories on the opt-in plaintiffs (8.0); phone call with A. Davis regarding discovery responses (.6); phone call with A. Chisholm regarding discovery responses (.7)	9.3	\$250.00	\$2,325.00
	02/04/15	JB	Prepare and finalize supplemental responses to interrogatories and requests for admission and J. Stephensons responses to requests for production of documents and prepare J. Stephensons responsive documents for services (1.8)	1.8	\$250.00	\$450.00
TOTAL HOURS/AMOUNT				17.9		\$4,475.00
Status	02/03/14	JB	Confer with DRK on the status of the case and prepare correspondence to opposing counsel regarding joint preliminary planning report	0.3	\$250.00	\$75.00
	02/24/14	JB	Prepare correspondence to clients regarding discovery and status of the litigation	0.3	\$250.00	\$75.00
	03/03/14	DRK	Conference with JB re status, future actions, strategic planning	0.5	\$400.00	\$200.00
	03/26/14	JB	Confer with DRK regarding status of the litigation; phone call to Jamie Stephenson regarding the same	0.3	\$250.00	\$75.00
	03/27/14	JB	Revise and edit reply in support of motion for conditional certification; phone call with Jamie Stephenson regarding status of the litigation	1.0	\$250.00	\$250.00
	04/21/14	JB	Review and respond to multiple correspondence with opposing counsel regarding status of depositions, employees and managers and requirement for subpoena	0.4	\$250.00	\$100.00
	04/23/14	DRK	Taking of W. Booze deposition, and brief discussions with Jim Mulroy re status, future actions	3.8	\$400.00	\$1,520.00
	07/08/14	JB	Phone calls to Phillip Davis and Byron Graham regarding status of the litigation	0.5	\$250.00	\$125.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	07/17/14	JB	Prepare litigation status update correspondence to J. Stephenson	0.1	\$250.00	\$25.00
	08/18/14	JB	Phone call with S. Brinkley regarding litigation status	0.1	\$250.00	\$25.00
	08/19/14	JB	Phone calls with S. Brinkley and F. Cham regarding litigation status	0.1	\$250.00	\$25.00
	11/20/14	DRK	Call with Jim Mulroy re status, future actions; email to JB re same	0.5	\$400.00	\$200.00
	12/01/14	JB	Multiple communications regarding mediation status (.2)	0.2	\$250.00	\$50.00
	12/01/14	DRK	Multiple emails to/from o/c re status, future actions; call from clients re status, answering their questions	1.0	\$400.00	\$400.00
	12/02/14	JB	Confer with DRK regarding mediation status and strategy (.3)	0.3	\$250.00	\$75.00
	01/05/15	JB	Phone call with B. Graham regarding status of discovery and mediation; prepare litigation strategy for last month of discovery	0.7	\$250.00	\$175.00
	01/22/15	DRK	Preparation of discovery dispute synopsis for Court; calls from clients re status, future actions	2.4	\$400.00	\$960.00
	01/27/15	DRK	Engaging in discovery call with Judge Jones re status, future actions (.4)	0.4	\$400.00	\$160.00
	02/13/15	JB	Phone call with expert regarding report status (0.5)	0.5	\$250.00	\$125.00
	02/24/15	DRK	Call from clients re 1.50 600.00 status, future actions (1.1)	1.1	\$400.00	\$440.00
	02/25/15	DRK	Long calls from clients re future actions, status (1.4)	1.4	\$400.00	\$560.00
	02/26/15	JB	Phone call with B. Graham regarding status of litigation (0.2)	0.2	\$250.00	\$50.00
	04/10/15	JB	Separate phone calls from B. Bridges and J. Jordan regarding status of case	0.2	\$250.00	\$50.00
	05/19/15	JB	Phone call with B. Harris regarding status of the case	0.1	\$250.00	\$25.00
	05/29/15	JB	Review file material regarding status of T. Davis settlement check (.2)	0.2	\$250.00	\$50.00
	05/29/15	JB	Phone call with S. Reid regarding status of litigation	0.1	\$250.00	\$25.00
	06/02/15	JB	Follow-up on the status of part two of the litigation	0.3	\$250.00	\$75.00
	06/09/15	JB	Phone calls with B. Artumus and B. Bridges regarding status of litigation	0.1	\$250.00	\$25.00
	06/10/15	JB	Phone call with J. Stephenson regarding status of the case (.1)	0.1	\$250.00	\$25.00
	06/23/15	JB	Phone call with T. Armstead regarding status of the litigation	0.1	\$250.00	\$25.00
	07/28/15	JB	Phone call with P. Davis regarding status of litigation	0.1	\$250.00	\$25.00
	08/09/15	JB	Review and respond to correspondence from M. Bice regarding status of the litigation	0.1	\$250.00	\$25.00
	08/24/15	JB	Review and respond to correspondence from B. Graham regarding the status of the litigation	0.1	\$250.00	\$25.00
	08/25/15	JB	Phone call with J. Stephenson regarding status of the litigation	0.1	\$250.00	\$25.00
	08/31/15	JB	Phone call w B. Creekmore regarding status of the case	0.1	\$250.00	\$25.00
	09/04/15	JB	call from J. Stephenson re status, future actions (.8)	0.8	\$250.00	\$200.00
	09/14/15	JB	Phone call with B. Artumus regarding status of litigation (0.1); phone call with B. Bridges regarding status of litigation (0.1).	0.2	\$250.00	\$50.00
	09/15/15	JB	Phone call with P. Dean regarding status of case and continued missed breaks	0.1	\$250.00	\$25.00
	09/16/15	JB	Phone call with S. Reid regarding status of the case	0.1	\$250.00	\$25.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	09/17/15	JB	Phone call with B. Graham regarding status of the case, recent short staffing and missed breaks, and new supervisors failure to pay overtime	0.2	\$250.00	\$50.00
	09/17/15	JB	Phone call with B. Graham regarding status of the case, recent short staffing and missed breaks, and new supervisors failure to pay overtime	0.2	\$250.00	\$50.00
	10/02/15	CM	Correspondence with JB; initial research into Youth Villages entity status	0.7	\$225.00	\$157.50
	10/07/15	CM	Research into Tennessee nonprofit status and corporate history in GA & NY	1.2	\$225.00	\$270.00
	10/08/15	JB	Begin to draft response to motion to clarify including legal research on status of claims/complaints post-severance	1.3	\$250.00	\$325.00
	02/25/16	SC	called all plaintiffs re settlement documents and status update	4.0	\$85.00	\$340.00
	03/10/16	SC	emailed Hazelwood re settlement and status update	0.1	\$85.00	\$8.50
	03/18/16	SC	emailed Amber Davis re status update	0.1	\$85.00	\$8.50
	03/21/16	JB	Confer with SC regarding status of settlement agreement signatures (0.2)	0.2	\$250.00	\$50.00
	03/21/16	JB	multiple phone calls with Mr. Booze regarding status of settlement payment (0.1)	0.1	\$250.00	\$25.00
	03/29/16	DRK	Short email to Jim M. re status	0.2	\$400.00	\$80.00
			TOTAL HOURS/AMOUNT	27.3		\$7,779.50
Motion for Certification	02/04/14	JB	Legal research on previous FLSA cases in from of Judge Steve Jones and any review any related opinions and briefs related to a motion for certification of a collective action	3.0	\$250.00	\$750.00
	02/04/14	JB	Legal research on the legal standard for a motion for certification of a collective action and begin drafting the same	2.0	\$250.00	\$500.00
	07/01/15	JC	Correspondence with DRK re motion for certification for interlocutory appeal	0.1	\$250.00	\$25.00
			TOTAL HOURS/AMOUNT	5.1		\$1,275.00
Motion for Conditional Certification	01/24/14	JB	Begin to prepare Plaintiffs motion for conditional certification	0.5	\$250.00	\$125.00
	02/06/14	JB	Continue to prepare motion for conditional certification	2.6	\$250.00	\$650.00
	02/07/14	JB	Continue to prepare motion for conditional certification including preparing affidavits for each client and preparing proposing notice of action and consent	3.5	\$250.00	\$875.00
	02/10/14	JB	Revise and edit motion for conditional certification	1.0	\$250.00	\$250.00
	02/13/14	JB	phone call with Phillip Davis regarding declaration in support of motion for conditional certification (.3)	0.3	\$250.00	\$75.00
	02/14/14	JB	Revise and edit motion for conditional certification	3.0	\$250.00	\$750.00
	02/17/14	JB	Continue to revise and edit motion for conditional certification (.3)	0.3	\$250.00	\$75.00
	02/18/14	JB	Prepare for David Thompson interview, phone call with Jamie Stephenson, confer with DRK regarding motion for conditional certification	0.7	\$250.00	\$175.00
	02/18/14	DRK	DRK edit of motion for conditional certification (2.3); preparation of new declaration needed for same (2.0); o/c with JB re same (.5)	4.8	\$400.00	\$1,920.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	02/24/14	JB	Revise and finalize motion for conditional certification	1.3	\$250.00	\$325.00
	03/14/14	JB	Review and analyze Defendants response in opposition to Plaintiffs motion for conditional certification and read the legal opinions cited in the same (1.0); begin drafting reply brief in support of motion for conditional certification (2.5)	3.5	\$250.00	\$875.00
	03/18/14	JB	Continue to prepare reply brief in support of motion for conditional certification (2); prepare declaration of Paul Willoughby in support of motion for conditional certification (0.3)	2.3	\$250.00	\$575.00
	03/21/14	JB	Continue to prepare reply in support of motion for conditional certification	2.0	\$250.00	\$500.00
	03/22/14	JB	Continue to prepare reply in support of motion for conditional certification	1.5	\$250.00	\$375.00
	03/24/14	JB	Continue to draft and revise reply in support of motion for conditional certification	2.3	\$250.00	\$575.00
	03/25/14	JB	Continue to revise and edit reply in support of motion for conditional certification	0.5	\$250.00	\$125.00
	03/27/14	JB	Revise and edit reply in support of motion for conditional certification; phone call with Jamie Stephenson regarding status of the litigation	1.0	\$250.00	\$250.00
	05/23/14	JB	Prepare supplement in support of motion for conditional certification by reviewing relevant deposition transcriptions, drafting said motion and gathering exhibits	4.3	\$250.00	\$1,075.00
	06/30/14	JB	Continue to draft reply in support of motion for leave to file supplemental briefing in support of motion for conditional certification	2.6	\$250.00	\$650.00
	10/03/14	JB	Review and analyze order on motion for conditional certification (.3)	0.3	\$250.00	\$75.00
TOTAL HOURS/AMOUNT				38.3		\$10,295.00
Production of Documents	01/24/14	JB	Begin drafting Plaintiffs first requests for production of documents	0.5	\$250.00	\$125.00
	02/04/14	JB	Continue drafting Plaintiffs first requests for production of documents	1.0	\$250.00	\$250.00
	02/06/14	JB	Continue to revise Plaintiffs first requests for production of documents	0.7	\$250.00	\$175.00
	02/10/14	JB	Continue to draft and revise first requests for production of documents	0.3	\$250.00	\$75.00
	03/14/14	JB	Continue to prepare responses and objections to defendants discovery interrogatories, requests for production of documents and request for admission to three plaintiffs	3.5	\$250.00	\$875.00
	04/08/14	JB	Review and analyze Defendants responses to plaintiffs interrogatories and requests for production of documents and prepare charts summarizing the same	2.0	\$250.00	\$500.00
	04/30/14	JB	revise Plaintiffs second requests for production of documents (.8)	0.8	\$250.00	\$200.00
	06/11/14	JB	Prepare follow-up correspondence to Youth Villages regarding deficiencies in their responses to Plaintiffs first request for production of documents	1.5	\$250.00	\$375.00
	06/11/14	JB	Prepare correspondence to Youth Villages regarding deficiencies in their responses to Plaintiffs second request for production of documents	0.7	\$250.00	\$175.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	07/11/14	CM	Draft third-party request for production of documents (cell phone communication records between manager and employee on personal phone) and downloaded N.D. Georgia subpoena form	2.6	\$150.00	\$390.00
	01/28/15	DS	Create shell of consolidated Request for production of documents and ROG responses	2.3	\$85.00	\$195.50
	01/30/15	JB	begin to prepare responses and objections to Defendants request for production of documents (2.5)	2.5	\$250.00	\$625.00
	01/31/15	JB	Continue to prepare responses and objections to Defendants requests for production of documents and interrogatories on the opt-in plaintiffs	8.0	\$250.00	\$2,000.00
	02/04/15	JB	prepare and finalize supplemental responses to interrogatories and requests for admission and J. Stephensons responses to requests for production of documents and prepare J. Stephensons responsive documents for services (1.8)	1.8	\$250.00	\$450.00
TOTAL HOURS/AMOUNT				28.2		\$6,410.50
Summary Judgment	06/22/14	JB	review and analyze Defendants motion for partial summary judgment and exhibits and prepare a summary of the same to DRK (0.6)	0.6	\$250.00	\$150.00
	06/30/14	JB	Begin to prepare Rule 56(d) motion regarding the need for additional time before responding to a motion for summary judgment	2.4	\$250.00	\$600.00
	07/01/14	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d)	0.8	\$250.00	\$200.00
	07/02/14	JB	Continue to draft response to Defendants motion for partial summary judgment pursuant to Rule 56(d) and attorney declaration in support	2.8	\$250.00	\$700.00
	07/07/14	JB	Revise response to defendants motion for summary judgment pursuant to Rule 56(d); prepare supporting declaration of Julie Burke; prepare response for filing	3.3	\$250.00	\$825.00
	10/06/14	JB	Review Courts summary Judgment Order	0.1	\$250.00	\$25.00
	03/03/15	JB	Begin to prepare motion for summary judgment by reviewing deposition testimony of D. Thompson for statement of undisputed facts (1.3)	1.3	\$250.00	\$325.00
	03/04/15	JB	Continue to prepare motion for summary judgment by continuing to review deposition testimony of E. Dowdel for statement of undisputed facts (1)	1.0	\$250.00	\$250.00
	03/05/15	JB	Continue to prepare motion for summary judgment by review deposition testimony of 30(b)(6) witness for statement of undisputed facts (1.9)	1.9	\$250.00	\$475.00
	03/10/15	JB	Continue to review deposition of B. Graham for statement of facts in summary judgment motion	1.5	\$250.00	\$375.00
	03/12/15	JB	continue drafting motion for summary judgment (0.5)	0.5	\$250.00	\$125.00
	03/13/15	JB	Continue drafting motion for summary judgment (2.5)	2.5	\$250.00	\$625.00
	03/16/15	JB	Continue to draft motion for summary judgment	8.2	\$250.00	\$2,050.00
	03/21/15	JB	revise and edit motion for summary judgment (3.1)	3.1	\$250.00	\$775.00
	03/23/15	JB	Revise and edit brief in support of motion for summary judgment and gather exhibits (1.0)	1.0	\$250.00	\$250.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	03/30/15	JB	Review and analyze Defendants motion for summary judgment, including analyze case law cited by Defendant	2.3	\$250.00	\$575.00
	03/31/15	JB	Continue to read and analyze case law cited in Defendants Motion for Summary Judgment	1.7	\$250.00	\$425.00
	04/15/15	JB	Revise and edit response to Defendants motion for summary judgment	5.0	\$250.00	\$1,250.00
	04/15/15	JB	Continue to revise and edit response to Defendants motion for summary judgment	2.1	\$250.00	\$525.00
	04/16/15	JB	Continue to revise and edit response to Defendants motion for summary judgment and prepare for filing by assuring consistency of exhibit citations	3.2	\$250.00	\$800.00
	04/16/15	DS	Finalize and file Motion for Summary Judgment with exhibits	2.3	\$85.00	\$195.50
	04/22/15	JB	Continue to prepare reply brief in support of Plaintiffs motion for summary judgment	2.3	\$250.00	\$575.00
	04/23/15	JB	Legal research on summary judgment burdens in general and summary judgment burdens in FLSA cases for the reply brief	3.2	\$250.00	\$800.00
	04/28/15	JB	Continue to draft reply brief in support of motion for summary judgment	6.5	\$250.00	\$1,625.00
	04/30/15	DS	Recreate Exhibit 24 of Motion for Summary Judgment	1.0	\$85.00	\$85.00
	07/22/15	JB	Review recent decision by Judge Batten regarding FWW application for potential upcoming summary judgment refiling	0.4	\$250.00	\$100.00
	08/31/15	TC	Receipt/analyze Defendants renewed motion for summary judgment statement of undisputed facts and affidavits in order to prepare response	1.7	\$200.00	\$340.00
	09/02/15	JB	Confer with TC regarding MSI response responsibilities (0.1); review and analyze Defendants renewed motion for summary judgment attached exhibits (1.4)	1.5	\$250.00	\$375.00
	09/03/15	JB	Continue to prepare response to motion for summary judgment	0.7	\$250.00	\$175.00
	09/10/15	TC	Receipt/analyze Defendants renewed motion for summary judgment (5); Draft legal arguments for response to Defendants renewed motion for summary judgment (8.0)	8.5	\$200.00	\$1,700.00
	09/11/15	TC	Continue to draft legal arguments for response to Defendants renewed motion for summary judgment	3.0	\$200.00	\$600.00
	09/16/15	JB	Continue to prepare Plaintiffs statement of additional facts in opposition to summary judgment motion	4.8	\$250.00	\$1,200.00
	09/17/15	JB	Continue to prepare Plaintiffs statement of additional facts in opposition to summary judgment motion and response to defendants statement of facts along with revisions to memorandum of law in response to renewed Motion for Summary Judgment	9.2	\$250.00	\$2,300.00
	09/18/15	JB	Revise and edit memorandum of law in opposition to motion for summary judgment	1.4	\$150.00	\$210.00
	09/19/15	JB	Revise and edit memorandum of law in opposition to motion for summary judgment	2.3	\$250.00	\$575.00
	09/20/15	JB	Revise and edit memorandum of law in opposition to motion for summary judgment	1.1	\$250.00	\$275.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	09/21/15	JB	Revise and edit memorandum of law in opposition to motion for summary judgment, response to defendants statement of facts, and plaintiffs statement of additional facts (5.5)	5.5	\$250.00	\$1,375.00
	10/06/15	JB	Review and analyze reply in support of motion for summary judgment including new exhibits and response to Plaintiffs statement of facts	1.1	\$250.00	\$275.00
	11/03/15	JB	Prepare a reply in support of objection to declarations of Turner and Dowdel regarding Defendants renewed motion for summary judgment	1.0	\$250.00	\$250.00
	11/03/15	JB	Revise and edit reply in support of objection to declarations of Turner and Dowdel regarding Defendants renewed motion for summary judgment	0.3	\$250.00	\$75.00
	12/05/15	TC	Continue to draft Plaintiff (Artumus) Response to Defendants Motion to Dismiss and Motion for Summary Judgment (6.5)	6.5	\$250.00	\$1,625.00
	12/06/15	TC	Continue to draft Plaintiffs Response to Defendants Motion to Dismiss and Motion for Summary Judgment (10.2)	10.2	\$200.00	\$2,040.00
	12/07/15	TC	(Caudle) Draft/file Consent Motion to extend Response to Def. Mot. for Summary Judgment	0.2	\$200.00	\$40.00
	12/07/15	DRK	continued work on responses to motions to dismiss, motion for summary judgment in Caudle	7.0	\$400.00	\$2,800.00
	12/08/15	TC	Draft/file proposed Order for Extension of Time to Respond to Defendants Motion to Dismiss and Motion for Summary Judgment (.7)	0.7	\$200.00	\$140.00
	12/08/15	TC	Research summary judgment standard for breach of contract claim in FLSA context in order to draft motion in response to summary judgment (2.3)	2.3	\$200.00	\$460.00
	12/09/15	CM	Analysis of cases in district courts re: summary judgment and FLSA preemption of state law contract claims (2.3)	2.3	\$225.00	\$517.50
	12/11/15	TC	(Caudle) Research summary judgment issues of preemption and 3 year statute of limitations for willfulness under the FLSA, burden of proof on movant (.6); draft response to motion for partial summary judgment (1.2)	1.8	\$200.00	\$360.00
	12/12/15	TC	(Caudle) Research job offer acknowledgement as valid contract and burden of proof of contract at dismissal stage; continue to draft response to motion for partial summary judgment (9.0)	9.0	\$200.00	\$1,800.00
	12/14/15	TC	(Caudle) Receipt/review of DRK edits to Plaintiffs Opposition to Defendants Motion for Partial Summary Judgment; continue to edit; add citations to DRK declaration (2.5)	2.5	\$200.00	\$500.00
TOTAL HOURS/AMOUNT				145.6		\$34,713.00
Decertification	01/07/15	JB	Legal research on standards for decertification post-discovery (1.5)	1.5	\$250.00	\$375.00
	01/09/15	JB	prepare declaration in opposition to motion for decertification (1.3)	1.3	\$250.00	\$325.00
	02/05/15	JB	Review Defendants citation to D. Thompson deposition testimony regarding decertification (0.2)	0.2	\$250.00	\$50.00
	02/12/15	JB	Review and analyze Defendants motion for decertification and related exhibits (.6)	0.6	\$250.00	\$150.00
	02/13/15	JB	continue to prepare response to motion for decertification (2)	2.0	\$250.00	\$500.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	02/20/15	JB	Legal research on the standard for decertification in order to prepare response brief	3.2	\$250.00	\$800.00
	02/24/15	JB	Continue to prepare response to motion for decertification including reviewing deposition of L. Pendelton and incorporating the same into the statement of facts	1.4	\$250.00	\$350.00
	02/25/15	JB	continuing preparing response to motion for decertification including drafting, legal research on employers obligations related to automatically deducted breaks and reviewing multiple deposition transcripts	7.7	\$250.00	\$1,925.00
	03/05/15	JB	Prepare declaration of M. Williams for response to decertification motion	0.3	\$250.00	\$75.00
	03/21/15	JB	Review and analyze Defendants reply in support of motion for decertification (0.5)	0.5	\$250.00	\$125.00
	03/23/15	JB	Begin to prepare motion to strike Defendants reply in support of their motion for decertification, including legal research on appropriate standard	1.1	\$250.00	\$275.00
	06/17/15	JB	Review and analyze prior decertification briefing in order to prepare surreply	1.2	\$250.00	\$300.00
	06/22/15	JB	Finalize revisions and edits to surreply in opposition to motion for decertification	1.7	\$250.00	\$425.00
	06/26/15	JB	Review and analyze Order granting motion to decertify (0.5); legal research on appeal of decertification orders (0.9)	1.4	\$250.00	\$350.00
	06/28/15	JC	Research case law re appealing decertification of FLSA collective 0.90 225.00 action.	0.9	\$250.00	\$225.00
	06/29/15	JC	Review order of decertification (-.5); research and analyze case law re appealing decertification orders (1.6)	2.1	\$250.00	\$525.00
	07/09/15	JB	prepare update correspondence to opt-in plaintiffs regarding decertification (0.1)	0.1	\$250.00	\$25.00
	07/10/15	JB	Revise correspondence to clients regarding update on decertification order and coordinate sending of the forty letters (0.3);	0.3	\$250.00	\$75.00
	07/23/15	JB	continue research for cases permitting rule 20 joinder post-decertification (3.6)	3.6	\$250.00	\$900.00
	07/24/15	JB	Continue legal research for cases allowing Rule 20 joinder after decertification	4.2	\$250.00	\$1,050.00
	07/27/15	TC	research 11th circuit case law re: Rule 20 joinder permitted after denial of conditional certification or decertification of a collective action (.5)	0.5	\$200.00	\$100.00
	07/28/16	TC	research 11th circuit case law re: Rule 20 joinder permitted after denial of conditional certification or decertification of a collective action (4.5)	4.5	\$200.00	\$900.00
	09/30/16	JB	Review file material for evidence that four plaintiffs did not elect not to join following the decertification order (0.2);	0.2	\$250.00	\$50.00
	11/29/15	TC	research national case law re: statute of limitations after collective action decertification (2.4)	2.4	\$200.00	\$480.00
TOTAL HOURS/AMOUNT				42.9		\$10,355.00
Decertify	03/09/15	JB	Revised and edit response to motion to decertify the class	3.3	\$250.00	\$825.00
	03/25/15	JB	Prepare supplement to plaintiffs response to the motion to decertify	0.5	\$250.00	\$125.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	06/18/15	JB	Begin to prepare surreply in opposition to Defendants motion to decertify including preparation of M. Thompson declaration, analysis of exemption reports cited in Binson declaration, and review of new authority cited in Defendants reply	4.2	\$250.00	\$1,050.00
	06/19/15	JB	Continue drafting surreply in opposition to Defendants motion to decertify (4.1)	4.1	\$250.00	\$1,025.00
	06/26/15	JB	Review and analyze Order granting motion to decertify (0.5)	0.5	\$250.00	\$125.00
			TOTAL HOURS/AMOUNT	12.6		\$3,150.00
Depositions						
	02/11/14	JB	Draft correspondence to opposing counsel regarding scheduling depositions (1); draft correspondence to DRK regarding finalizing initial disclosures and strategy for depositions (1)	0.2	\$250.00	\$50.00
	04/09/14	JB	Prepare for depositions of defendants	1.0	\$250.00	\$250.00
	04/09/14	JB	Legal research on fluctuating workweek prerequisites in order to prepare for depositions	3.7	\$250.00	\$925.00
	04/15/14	JB	Continue to review defendants document production and prepare for depositions	2.7	\$250.00	\$675.00
	04/16/14	JB	Continue to review Defendants document production to prepare for depositions and prepare discovery deficiency letter	4.0	\$250.00	\$1,000.00
	04/17/14	JB	Continue to prepare to for client deposition prep meeting; continue to prepare outline for depositions of Youth Villages employees	3.0	\$250.00	\$750.00
	04/18/14	JB	Meeting with Phillip Davis regarding deposition (1.5); meeting with Jamie Stephenson regarding deposition of current Youth Villages employees (1.5); continue to prepare and revise outline of depositions of Youth Villages employees (1);	4.0	\$250.00	\$1,000.00
	04/21/14	JB	Review and respond to multiple correspondence with opposing counsel regarding status of depositions, employees and managers and requirement for subpoena	0.4	\$250.00	\$100.00
	04/22/14	JB	Prepare for depositions of Mr. Booze and Mr. Graham	2.5	\$250.00	\$625.00
	04/24/14	JB	Prepare for and defend deposition of Paul Willoughby	5.3	\$250.00	\$1,325.00
	04/24/14	JB	Prepare for and take deposition of David Thompson	2.0	\$250.00	\$500.00
	04/24/14	JB	Prepare summary of todays depositions	0.2	\$250.00	\$50.00
	04/24/14	JB	JB Phone call with Mr. Stephenson regarding depositions 0.20 50.00	0.2	\$250.00	\$50.00
	12/01/14	SC	Per JB's request I called Fannie Cham, Bernard Artumus, Jamie Stephenson, Lamar Hayes, Benjamin Creekmore, and Steven Ventre to inform them that they are being deposed and to set up the date and time of their depositions. I also sent each one of them an email confirming their deposition times and the notice of deposition.	0.4	\$85.00	\$34.00
	12/01/14	JB	Phone calls with opt-ins regarding scheduling depositions (5);	0.5	\$250.00	\$125.00
	12/02/14	JB	Schedule opt-in depositions (2);	0.2	\$250.00	\$50.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	12/04/14	JB	Prepare to defend depositions of opt-ins by reviewing Defendants prior depositions of party plaintiffs, preparing outline of likely questions, reviewing defendants document production to gather potential exhibits	4.2	\$250.00	\$1,050.00
	12/05/14	JB	Continue to prepare clients for depositions by reviewing and gathering relevant documents	2.6	\$250.00	\$650.00
	12/08/14	JB	Travel to deposition of clients in Douglasville (0.7); prepare clients, attend and defend depositions of Fannie Cham and Jamie Stephenson (6); travel from deposition of clients in Douglasville (0.5)	7.2	\$250.00	\$1,800.00
	12/09/14	JB	Travel to deposition of clients in Douglasville (0.6); prepare clients, attend and defend depositions of Bernard Artumus, Stephen Ventre, and Lamar Hayes (7.3); travel from deposition of clients in Douglasville (0.6)	8.5	\$250.00	\$2,125.00
	01/06/15	SC	I called all deponents; Starsheema Drake, Portia Manning, Rebecca Schwam, Lavon Flood, Steven Reid, Travis Floyd, Angela Cooper and Steven Liner to inform them of their upcoming depositions and to let them know that the mediation had been cancelled. I also called all opt in clients (47 total) that had been served with discovery to inform them the mediation had been cancelled and to set up times for them to meet with JB and Douglas R. Kertscher. I created a detailed index which included scheduled time, date for depositions and meetings.	2.5	\$85.00	\$212.50
	01/06/15	JB	prepare to schedule client meetings regarding discovery responses and confirm client availability for depositions (2.0)	2.0	\$250.00	\$500.00
	01/06/15	DS	Researched and reserved hotel and meeting rooms in Douglasville, GA for depositions	0.8	\$85.00	\$68.00
	01/07/15	JB	begin to prepare to defend opt-in depositions	0.3	\$250.00	\$75.00
	01/08/15	SC	Per JB's request I called Sherri Grant, Matthew Haecker, Frederick Hoxie, Steven Liner and Nicole Stevens to schedule depositions for 3 open slots that needed to be filled	0.2	\$85.00	\$17.00
	01/09/15	JB	begin to prepare to defend depositions of opt-ins, prepare declaration in opposition to motion for decertification (1.3)	1.3	\$250.00	\$325.00
	01/09/15	DS	Prepare and print and copy documents for upcoming depositions (1.5)	1.5	\$85.00	\$127.50
	01/12/15	JB	Travel to Douglasville for client meetings and depositions (0.8); prepare two clients for depositions, review client time and payroll records to prepare for multiple client discovery response meetings, meet with six clients to complete discovery responses (8);	8.8	\$250.00	\$2,200.00
	01/12/15	DRK	travel to Douglasville, meeting with multiple clients re preparation for deposition; review of key documents and payroll items with clients; defending of depositions	9.1	\$400.00	\$3,640.00
	01/13/15	DRK	meeting with clients re defending depositions (8); o/c with JB re same (.3); participation in deposition (6.6)	7.7	\$400.00	\$3,080.00
TOTAL HOURS/AMOUNT				87.0		\$23,379.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
Calculations	01/22/14	TO	Prepared Armstead overtime calculations	0.6	\$115.00	\$69.00
	12/16/14	JB	continue to work on damages calculations (0.3)	0.3	\$250.00	\$75.00
	12/16/14	TO	Worked on overtime calculations for Artumus	2.7	\$115.00	\$310.50
	12/17/14	JB	Review damages calculations documents	0.3	\$250.00	\$75.00
	12/17/14	TO	Worked on overtime calculations for Artumus, Cham	1.2	\$115.00	\$138.00
	12/17/14	TO	Prepared overtime calculations for Cham	1.6	\$115.00	\$184.00
	12/17/14	TO	Prepared overtime calculations for Ventre	1.6	\$115.00	\$184.00
	12/17/14	TO	Prepared overtime calculations for Booze	1.9	\$115.00	\$218.50
	12/17/14	TO	Prepared overtime calculations for Graham	2.1	\$115.00	\$241.50
	12/18/14	TO	Prepared overtime calculations for Graham	0.5	\$115.00	\$57.50
	12/18/14	TO	Prepared overtime calculations for Holmes	0.9	\$115.00	\$103.50
	12/18/14	TO	Prepared overtime calculations for Stevenson, Davis (began)	2.7	\$115.00	\$310.50
	12/19/14	TO	Worked on overtime calculations for Davis	0.4	\$115.00	\$46.00
	12/22/14	TO	Prepared Creekmore overtime calculations	0.5	\$115.00	\$57.50
	12/22/14	TO	Prepared Burgess overtime calculations	0.5	\$115.00	\$57.50
	12/22/14	TO	Prepared Bolton overtime calculations	0.3	\$115.00	\$34.50
	12/22/14	TO	Prepared Brinkley overtime calculations	0.2	\$115.00	\$23.00
	12/22/14	TO	Prepared Caudle overtime calculations	0.4	\$115.00	\$46.00
	12/22/14	TO	Prepared Chisholm overtime calculations	0.2	\$115.00	\$23.00
	12/22/14	TO	Prepared Craft overtime calculations	1.4	\$115.00	\$161.00
	12/23/14	TO	Prepared Davis, Willoughby calculations	4.1	\$115.00	\$471.50
	12/29/14	TO	Prepared Floyd overtime calculations	0.8	\$115.00	\$92.00
	12/29/14	TO	Prepared Dean overtime calculations	1.5	\$115.00	\$172.50
	01/05/15	TO	A. Davis calculations	1.5	\$115.00	\$172.50
	01/05/15	TO	T. Davis, B Harris, M. Haynes, D. Hazelwood, F. Hoxie, B. Jackson calculations	4.7	\$115.00	\$540.50
	01/06/15	TO	J. Jordan, S. Limer, J. Lockett, M. McKelvey, R. McNair, T. Sawadogo, C. Simmons, G. Smith calculations	7.7	\$115.00	\$885.50
	01/07/15	TO	Demand calculations for Sykes, Williams, Bridges, Cooper, Drake, Flood, Gaddy, Gilstrap, Manning, Reid, Schwam, Starr, Stevens, Waugh, compiled information	9.3	\$115.00	\$1,069.50
	01/11/15	JB	Review and analyze damages calculations sheets for each opt-in	4.0	\$250.00	\$1,000.00
	01/16/15	TO	Overtime calculations	3.1	\$115.00	\$356.50
TOTAL HOURS/AMOUNT				57.0		\$7,176.00
M. Thompson	01/21/15	DS	Forward discovery produced by Youth Villages to M. Thompson via CRA secure file system	1.5	\$85.00	\$127.50
	01/23/15	DS	Forward all discovery received from Youth Villages to M. Thompson at CRA	1.0	\$85.00	\$85.00
	02/09/15	JB	Phone call with M. Thompson regarding damages report (0.3);	0.3	\$250.00	\$75.00
	02/16/15	JB	Phone call with M. Thompson regarding expert report (0.3)	0.3	\$250.00	\$75.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	02/17/15	JB	Prepare multiple correspondence to opposing counsel regarding discovery; review M. Thompsons Exhibit B to assess individual damages claims; review and analyze Defendants settlement offers	2.0	\$250.00	\$500.00
	03/05/15	JB	continue to prepare for Dickson deposition by preparing outline, reviewing pay and time records for exhibits, and phone call with M. Thompson (4.3)	4.3	\$250.00	\$1,075.00
	04/27/15	JB	prepare correspondence to M. Thompson regarding the same (0.1).	0.1	\$250.00	\$25.00
	06/18/15	JB	Begin to prepare surreply in opposition to Defendants motion to decertify including preparation of M. Thompson declaration, analysis of exemption reports cited in Binson declaration, and review of new authority cited in Defendants reply	4.2	\$250.00	\$1,050.00
	06/19/15	JB	phone call with M. Thompson regarding deduction cancellations and declaration (0.4)	0.4	\$250.00	\$100.00
			TOTAL HOURS/AMOUNT	14.1		\$3,112.50
Matthew Thompson	01/20/15	DRK	call with Matthew Thompson and discussion of expert report issues (1.1)	1.1	\$400.00	\$440.00
			TOTAL HOURS/AMOUNT	1.1		\$440.00
Expert Report	01/20/15	DRK	call with Matthew Thompson and discussion of expert report issues (1.1)	1.1	\$400.00	\$440.00
	02/16/15	JB	Phone call with M. Thompson regarding expert report (0.3); review Plaintiffs and Defendants expert reports (2.5)	2.8	\$250.00	\$700.00
	04/27/15	JB	Legal research on admissibility of unsworn expert reports at summary judgment (0.9); prepare expert declaration to cure defect (0.2); prepare correspondence to M. Thompson regarding the same (0.1)	1.2	\$250.00	\$300.00
			TOTAL HOURS/AMOUNT	5.1		\$1,440.00
Save	04/11/14	SC	Per JB's request I saved documents from a CD, printed the documents and created a folder for the file	0.6	\$85.00	\$51.00
	01/14/15	DS	Download, saved and printed Defendants document production (.3)	0.3	\$85.00	\$25.50
	01/15/15	DS	Scanned and saved discovery responses	0.3	\$85.00	\$25.50
	01/27/15	DS	Save Travis Floyd deposition transcript and exhibits	0.3	\$85.00	\$25.50
	01/27/15	DS	Save discovery documents received from Youth Villages	0.3	\$85.00	\$25.50
			TOTAL HOURS/AMOUNT	1.8		\$153.00
Burn	01/20/15	DS	Burn discovery production to disc for overnight delivery to M. Thompson (.5)	0.5	\$85.00	\$42.50
			TOTAL HOURS/AMOUNT	0.5		\$42.50

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
Prepare Lawsuit	07/09/15	JB	Prepare lawsuit on behalf of individual Plaintiffs (2.2);	2.2	\$250.00	\$550.00
			TOTAL HOURS/AMOUNT	2.2		\$550.00
Appeal	07/08/15	JB	Continue legal research on interlocutory appeal NOTE: "appeal" is also contained in searches for "motion for certification" and "decertification"	0.3	\$250.00	\$75.00
			TOTAL HOURS/AMOUNT	0.3		\$75.00
Rule 20 Joinder	07/22/15	JB	begin legal research on Rule 20 Joinder versus collective action (1.5) NOTE: "Rule 20 Joinder" is also contained in search for "decertification"	1.5	\$250.00	\$375.00
			TOTAL HOURS/AMOUNT	1.5		\$375.00
Group allegations	07/31/15	TC	Research 11th Circuit cases to support argument that group allegations were properly plead when facts are common to all plaintiffs (2.6); editing of brief in order to reflect case law in support of sufficiency of pleading of group allegations (2.2)	4.8	\$200.00	\$960.00
			Research 11th Circuit and general federal circuit authority for sufficiency of group allegations under Rule 8 in FLSA claims and proper for all Plaintiffs to rely on such group allegations	6.0	\$200.00	\$1,200.00
			TOTAL HOURS/AMOUNT	10.8		\$2,160.00
Sufficiency of pleading	07/27/15	TC	Continue to research 11th circuit rule 8 pleading cases to support position of sufficiency of pleading (.5);	0.5	\$200.00	\$100.00
	07/28/15	TC	Continue to research 11th circuit rule 8 pleading cases to support position of sufficiency of pleading (2.0);	2.0	\$200.00	\$400.00
	07/31/15	TC	editing of brief in order to reflect case law in support of sufficiency of pleading of group allegations (2.2)	2.2	\$200.00	\$440.00
			TOTAL HOURS/AMOUNT	4.7		\$940.00
Joinder	07/25/15	DRK	review of YV Motion to dismiss on Joinder grounds; research re response, other rulings by Judge; email to Telephone call and JB outlining draft response, sending research for same	6.7	\$400.00	\$2,680.00
			Begin to draft response to motion to dismiss for lack of joinder	2.3	\$250.00	\$575.00
			Continue to prepare response to motion to dismiss on joinder grounds	2.4	\$250.00	\$600.00
	07/30/15	JB	Continue to prepare response to motion to dismiss on joinder grounds and revise motion regarding lqbal challenges	3.2	\$250.00	\$800.00

SEARCH TERM	DATE	TIMEKEEPER	TIME DESCRIPTION	HOURS	HOURLY RATE	AMOUNT
	07/31/15	JB	Continue to draft joinder portion of the response to motion to dismiss NOTE: "Joinder" is also contained in searches for "Rule 20 joinder" and "decertification"	3.2	\$250.00	\$800.00
TOTAL HOURS/AMOUNT				17.8		\$5,455.00
Motion to clarify	10/08/15	JB	Begin to draft response to motion to clarify including legal research on status of claims/complaints post-severance	1.3	\$250.00	\$325.00
	10/09/15	JB	Continue to prepare response to motion to clarify	0.7	\$250.00	\$175.00
	10/12/15	JB	Revise response to motion to clarify	0.8	\$250.00	\$200.00
	TOTAL HOURS/AMOUNT				2.8	\$700.00
Index	04/15/15	SC	I created an index of those who filed their consents late	0.2	\$85.00	\$17.00
	11/12/15	JB	Analyze defendants prior document production and prepare an index of the same	1.5	\$250.00	\$375.00
	11/13/15	JB	Analyze defendants prior document production and prepare an index of the same	1.3	\$250.00	\$325.00
	NOTE: "Index" is also contained in search for "depositions"					
TOTAL HOURS/AMOUNT				3.0		\$717.00